



June 24, 2025

The Honorable Joel H. Slomsky
Chambers of Judge Joel H. Slomsky@paed.uscourts.gov

**Re: April Ploeger v. The Trustees of the University of Pennsylvania,
E.D. Pa., No. 2:22-cv-02389-JHS
Consent Request for Extension of Deadline**

Dear Judge Slomsky,

I represent the Plaintiff, April Ploeger, in this case. The Plaintiff's Response to Summary Judgment is due Tuesday, July 1, 2025. An original agreement was created between the counsels to give the Defense additional time to file errata which would also give the Plaintiff additional time to file the Response to Summary Judgment. The Defense no longer requires the additional time, however, in order to comply with their original request, I moved back the dates on our calendar. As a result, new deadlines replaced this one. Due to the now crowded deadlines, I would like to request a ten (10) day extension to file the Response to Summary Judgment on July 11, 2025.

The Defendant's counsel, Leslie Miller Greenspan, has been corresponded with and the Defendant has no objection to the request for an extension.

Best regards,

s/ Marty Harris
Marty Harris, Esquire
Trial lawyer for April Ploeger